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February 27, 2007

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VIA CM/ECF FILING

Honorable Sue L. Robinson United States District Court for the District of Delaware J. Caleb Boggs Federal Building 844 N. King Street, Room 6124 Lockbox 31 Wilmington, DE 19801

RE: Adams v. Genesis Insurance Company,

Case No. 06-CV-00364-SLR

Dear Judge Robinson:

We represent the plaintiff, Arlin M. Adams, Chapter 11 Trustee of Coram Healthcare Corporation and Coram, Inc. (the "Trustee") in the above matter. We are in receipt of defense counsel's February 23, 2007 letter regarding Your Honor's February 13, 2007 Order for Scheduling Conference, which was issued after defendant filed its unsolicited "Status Report Regarding Colorado Coverage Action."

The Trustee opposes the defendant's request that the telephone conference be deferred until after the Court decides defendant's motion to dismiss or stay the case. The Trustee believes that the telephone conference will be beneficial because it will afford the parties an opportunity to address with the Court the status of this matter and its relationship to the Colorado case.

We disagree with defendant's assertion that this action should be terminated in favor of the Colorado action, which is not scheduled to go to trial until Febraury 11, 2008. In this matter, the Court will be called on to determine whether the defendant unreasonably withheld its consent to the Trustee's \$9.95 million settlement with the Outside Director defendants in the breach of fiduciary duty case pending before Your Honor (Case No. 04-1565). This issue is not part of the Colorado case, which was filed some 14 months before the Trustee settled with the Outside Directors. The defendant did not seek to amend the pleadings in the Colorado case to add claims relating to the settlement and the deadline for filing such a motion expired months ago. Further, since the underlying case is pending here, the Bankruptcy Court for this District has already approved the settlement and Delaware corporate law applied to the causes of action against the Outside Directors, this Court is best suited to decide whether the settlement was reasonable.



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> Respectfully, Ruhand a Barkary

Richard A. Barkasy

For SCHNADER HARRISON SEGAL & LEWIS LLP

cc: Thomas J. Judge, Esquire (via email) Carmella P. Keener, Esquire (via email)